

REMARKS

1. In response to the Office Action mailed September 1, 2005, Applicants respectfully request reconsideration. Claims 1-4, 6-14 and 16-19 were last presented for examination. In the outstanding Office Action, all pending claims were rejected. Claims 1, 14 and 17 have been amended. No claims have been canceled or added in this paper. Thus, upon entry of this paper, claims 1-4, 6-14 and 16-19 will remain pending in this application. Of these 17 claims, three (3) claims (claim 1, 14 and 17) are independent. Based on the above Amendments and following Remarks, Applicants respectfully request that the outstanding objections and rejections be reconsidered, and that they be withdrawn.

Claim Rejections

2. Claims 1-4, 6-14 and 16-19 have been rejected under 35 U.S.C. §103(a) as being anticipated by U.S. Patent No. 5,848,243 to Kulkarni, *et al.* (hereinafter, "Kulkarni") in view of U.S. Patent No. 6,295,527 to McCormack, *et al.* (hereinafter, "McCormack"). Applicants respectfully submit that these rejections are improper and should be withdrawn.

3. Independent claim 1 recites, in part: "A method for providing information related to one or more networks, the method comprising: ... displaying a plurality of filter criteria, wherein in the displayed criteria comprises a list of a plurality of status levels; receiving a user selection of one or more of said displayed filter criteria; retrieving network device information related to a plurality of network devices in said one or more networks which satisfy said selected filter criteria; and creating for display on a single display page a visual representation of said network device information, said visual representation including two or more network segments each visually distinguishable from any other network segment included in the visual representation, wherein said visual representation of each of said network segments comprises a plurality of network devices which satisfy said selected filter criteria, and which is physically connected to a same wire." (*See*, Applicants' claim 1, as amended above.)

4. In the Office Action, the Examiner recognized that Kulkarni does not disclose selecting a filter, and instead relied on McCormack as allegedly disclosing selecting a filter. McCormack is directed to mechanisms for establishing and viewing groups of

devices within a network. McCormack discloses a filter dialog through which a user can select filter criteria. (*See*, McCormack at col. 9 lines 13-18.) This filter dialog is described as tabular data presented to a user through a graphical user interface. (*See*, McCormack at col. 9 lines 18-20.) This filter dialog is initially displayed with none of the values in the filter dialog selected. The user then selects filter criteria by pointing a cursor at the filter dialog and clicking on the desired values. (*See*, McCormack at col. 11 lines 39-44.) This filter dialog, however, does not display a list of a plurality of status levels for selection by the user.

5. Applicants, therefore, respectfully submit that neither Kulkarni nor McCormack, whether taken alone or in combination, teach or suggest “displaying a plurality of filter criteria, wherein in the displayed criteria comprises a list of a plurality of status levels; receiving a user selection of one or more of said displayed filter criteria; retrieving network device information related to a plurality of network devices in said one or more networks which satisfy said selected filter criteria ...,” as recited in claim 1. As such, Applicants respectfully assert that independent claim 1 is allowable for at least this reason.

6. Claim 1, as amended, further recites a “visual representation including two or more network segments each visually distinguishable from any other network segment included in the visual representation by an indicia...” In the Office Action, the Examiner alleged that Fig. 6A of Kulkarni illustrates two subsets visually distinguishable from one another by allowing one to see how they are connected by a router. (*See*, Office Action at pg. 7). Even assuming that the Examiner is correct, these Figures do not illustrate that the two subsets are visually distinguishable by an indicia. Rather, Fig. 6A merely illustrates two subnets connected by a router. McCormack, the secondary reference relied on by the Examiner, does not cure this defect of Kulkarni. Applicants, therefore, respectfully submit that claim 1 is allowable over the cited references for at least the reason that neither Kulkarni nor McCormack, whether taken alone or in combination, teach or suggest a “visual representation including two or more network segments each visually distinguishable from any other network segment included in the visual representation by an indicia....” As such, Applicants respectfully request that the Examiner reconsider and withdraw the rejection to claim 59 for at least this additional reason.

7. Applicants further submit that the Examiner has also failed to establish a *prima facie* case of obviousness for the additional reason that the Examiner has failed to establish a proper motivation to combine the Kulkarni and McCormack references. To establish a *prima facie* case of obviousness, there must first be some suggestion or motivation, either in the references themselves, or in the knowledge generally available to one of ordinary skill in the art, to modify the references or to combine reference teachings. *See*, MPEP at § 2143. In the Office Action, the Examiner, however, did not cite to any motivation to combine the Kulkarni and McCormack references. Instead, the Examiner merely stated, “The McCormack references further teaches it is desirable to have a network information collection system that dynamically and in response to requests can determine current membership of devices.” This, however, merely alleges a reason for using the McCormack reference. It does not provide a reason for combining the Kulkarni reference with the McCormack reference. Thus, although this cited section alleges a motivation for using the teachings of the McCormack reference, it fails to establish a motivation to combine the Kulkarni and McCormack references. As such, Applicants respectfully submit that claim 1 is allowable over the cited references for at least this additional reason.

8. Independent claim 14 recites, in part, “A network management node ...comprising: ... modules ... operable to display a plurality of filter criteria, wherein in the displayed criteria comprises a list of a plurality of status levels, receive a user selection of one or more of said displayed filter criteria; store filter information regarding said selection of filter criteria in the database...” and a “visual representation including two or more network segments each visually distinguishable from any other network segment included in the visual representation by an indicia....” Applicants respectfully submit that for at least similar reasons to those discussed above, Independent claim 14 is likewise in condition for allowance.

9. Independent claim 17 recites, in part, “A computer readable medium on which is embedded a program, the program performing a method ... comprising: displaying a plurality of filter criteria, wherein in the displayed criteria comprises a list of a plurality of status levels; receiving a user selection of one or more of said displayed filter criteria;...” and a “visual representation including two or more network segments each visually distinguishable from any other network segment included in the visual representation by an

indicia....” Applicants therefore respectfully submit that independent claim 17 is therefore in condition for allowance for at least similar reasons to those discussed above.

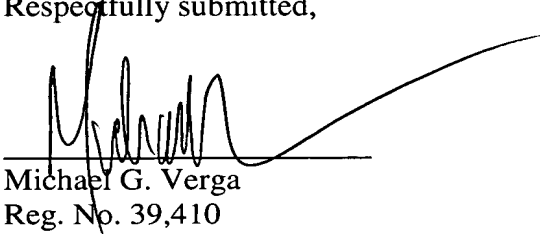
Dependent Claims

10. The dependent claims incorporate all of the subject matter of their respective independent claims and add additional subject matter which makes them a fortiori and independently patentable over the art of record. Accordingly, Applicants respectfully assert that the dependent claims are patentable over the art of record at least for the same reasons as those noted above.

Conclusion

11. In view of the foregoing, this application should be in condition for allowance. A notice to this effect is respectfully requested.

Respectfully submitted,



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